



4. Plaintiffs, Richard Dozier and Gail Dozier allege in the Complaint that they own property in Old Hickory, Davidson County, Tennessee.

5. Standard Fire Insurance Corporation is a foreign insurance corporation and is engaged in the sale of property insurance within the State of Tennessee. It is a Connecticut Corporation.

6. This dispute is between persons of different states and the amount in dispute between the parties is in excess of \$75,000.00, exclusive of costs and interest; therefore, it meets the jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

7. Venue is correct herein because Plaintiff's action is pending in Wilson County, Tennessee.

8. Counsel for this Defendant has served on Counsel for Plaintiff a Notice of Removal. Copies of the Notice of Removal and Petition for Removal have been filed in Wilson County Circuit Court by this Defendant within 30 days of service of the Complaint on Defendant.

**WHEREFORE**, please take notice that Defendant, Standard Fire Insurance Company, removes the state action styled *Richard Dozier and Gail Dozier v. Standard Fire Insurance Company*, docket number 2013-CV-685 from the Circuit Court of Wilson County, Tennessee where it is now pending, to the United States District Court for the Middle District of Tennessee on this the 17th day of January, 2014.

Respectfully submitted,

**SPICER RUDSTROM, PLLC**

/s/ Marc O. Dedman  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document has been served on counsel reflected below via regular mail and via email.

Thomas W. Thompson, Esq.  
The Thompson Trial Group, P.A.  
4725 North Lois Avenue  
Tampa, Florida 33614

This the 17<sup>th</sup> day of January, 2014.

/s/ Marc O. Dedman  
Marc O. Dedman